

Exhibit “A”

Electronically Issued
12/17/2019 5:22 PM

1 Michael Kind, Esq.
2 Nevada Bar No.: 13903
3 **KIND LAW**
4 8860 South Maryland Parkway, Suite 106
5 Las Vegas, Nevada 89123
6 (702) 337-2322
7 (702) 329-5881 (fax)
8 mk@kindlaw.com
9 Attorney for Plaintiff John Doe (NY)

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**EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

John Doe (NY),

Plaintiff,

v.

Russell Road Food And Beverage,
LLC dba Crazy Horse 3
Gentlemen's Club, et al,

Defendant.

CASE NO: A-19-807137-C
Case No.:
Dept. No.: Department 28

SUMMONS

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE
AGAINST YOU WITHOUT YOU BEING HEARD UNLESS
YOU FILE A RESPONSE WITH THE COURT WITHIN 21
DAYS. READ THE INFORMATION BELOW CAREFULLY.**

**To the Defendant: Russell Road Food And Beverage, LLC dba Crazy Horse
3 Gentlemen's Club**

A civil complaint has been filed by the Plaintiff against you. Plaintiff is seeking to recover the relief requested in the complaint, which could include a money judgment against you or some other form of relief.

SUMMONS

— 1 —

Case Number: A-19-807137-C

KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123

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Las Vegas, Nevada 89123

If you intend to defend this lawsuit, within 21 calendar days¹ after this Summons is served on you (not counting the day of service), you must:

1. File with the Clerk of the Court, whose address is shown below, a formal written response to Plaintiff's complaint, in accordance with the rules of the court.
2. Pay any required filing fees to the court, or request a waiver of the filing fee.
3. Serve a copy of your response upon the attorney whose name and address is shown below

If you fail to respond, the Plaintiff can request your default. The court can then enter judgment against you for the relief demanded by the Plaintiff in the complaint, which could result in money or property being taken from you or some other relief requested in Plaintiff's complaint.

If you intend to seek an attorney's advice, do it quickly so that your response can be filed on time.

STEVEN D. GRIERSON, CLERK OF COURT

Marie Kramer 12/18/2019
By: Marie Kramer Date
Deputy Clerk
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155

Issued at the request of:

Michael Kind
Michael Kind, Esq.
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123

¹ The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members, and legislators each have 45 days after service of this Summons within which to file a response to Plaintiff's complaint.

DISTRICT COURT CIVIL COVER SHEET

CASE NO: A-19-807137-C

Clark

County, Nevada

Department 28

Case No.

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)	
Plaintiff(s) (name/address/phone): John Doe (NY)	Defendant(s) (name/address/phone): Russell Road Food And Beverage, LLC dba Crazy Horse 3 Gentlemen's Club, et al
Attorney (name/address/phone): Michael Kind 8860 S. Maryland Parkway, Suite 106 Las Vegas, Nevada 89123 702 337-2322 – MK@KINDLAW.COM	Attorney (name/address/phone):

II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and asset value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Partition to Sell Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input checked="" type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil cover sheet.

December 17, 2019

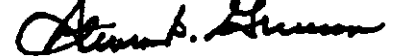
Date

Michael Kind

Signature of initiating party or representative

See other side for family-related case filings.

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12/17/2019 5:21 PM
Steven D. Grierson
CLERK OF THE COURT



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CASE NO: A-19-807137-C
Department 28

**EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

11 John Doe (NY),

12 Plaintiff,

14 v.

15 Russell Road Food and Beverage,
16 LLC dba Crazy Horse 3
17 Gentlemen's Club, Doc 2 through
18 100, and Roe Corporation 1
19 through 100,

20 Defendants.

Case No.:
Dept. No.:

Complaint for damages

**EXEMPT from Arbitration:
Excess of \$50,000**

Jury Trial Demanded

Introduction

- 22 1. This Complaint arises out of unlawful and deceptive actions committed by
23 Russell Road Food and Beverage, LLC *doing business as* Crazy Horse 3
24 Gentlemen's Club ("CH3"), Doc 2 through 100 and Roe Corporation 1
25 through 100 (collectively referred to herein as "Defendants"), causing
26 harm to John Doe (NY) ("Plaintiff"), in connection with a scheme in which
27

COMPLAINT

— 1 —

1 Defendants drugged Plaintiff and then drained his credit card account,
2 while Plaintiff was in and out of consciousness.

3 2. Defendants violated multiple provisions of NRS 598, Federal and Nevada
4 RICO, and committed conversion and fraud against Plaintiff.

5 3. Plaintiff seeks actual damages, statutory damages, consequential damages,
6 punitive damages in an amount sufficient to punish Defendants and to deter
7 others from like conduct, and attorneys' fees and costs.

8 Jurisdiction

9 4. This Court has jurisdiction to hear this case.

10 5. Defendants are people and corporations doing business in Clark County,
11 Nevada.

12 6. The parties' relationship arose out of Plaintiff's visit to Defendants' club
13 in Las Vegas.

14 7. Therefore, the Eighth Judicial District Court, Clark County, Nevada has
15 personal jurisdiction over both Plaintiff and Defendant and subject matter
16 jurisdiction pursuant to Article 6, Section 6 of the Nevada Constitution and
17 NRS 4.370.

18 Parties

19 8. Plaintiff is an individual and a resident of New York State.

20 9. CH3 provides adult entertainment in Las Vegas, primarily targeted toward
21 and visited by tourists and out-of-town visitors.

22 10. The true names and capacities, whether individual, plural, corporate,
23 partnership, associate, or otherwise, of defendants Doe 2 through 100 and
24 Roe Corporation 1 through 100 inclusive are unknown to Plaintiff at this
25 time, who therefore sues these defendants by such fictitious names. The
26 full extent of the facts linking such fictitiously sued defendants is unknown
27 to Plaintiff.

1 11. Plaintiff is informed and believes and therefore alleges that each of the
2 defendants designated herein as a Doe or Roe was and is responsible for
3 the events described herein. Plaintiff intends to seek leave of the Court to
4 amend this Complaint to show the true names of these fictitiously named
5 defendants after some initial discovery.

6 12. The legal responsibility of these Doe and Roe defendants arises out of, but
7 is not limited to, their status as employees, agents, managers, officers of
8 Defendant, and/or other related people or entities.

9 13. All of the acts and/or failures to act alleged herein were duly performed by
10 and/or are attributable to Defendants, acting by and through their agents
11 and employees. Said acts and failures to act were within the scope of said
12 agency and/or employment, and Defendants ratified said acts and
13 omissions.

14 **Factual allegations**

15 14. On the evening of October 11-12, 2019 (Friday night), Plaintiff visited
16 CH3, while visiting Las Vegas with a group of his friends.

17 15. At approximately 11:30 p.m., Plaintiff was invited to a back room for a
18 dance.

19 16. Plaintiff was immediately barraged by two women who began to bring
20 Plaintiff one drink after another, and encouraging him to drink.

21 17. As some point, the women gave Plaintiff and unidentified drug substance,
22 after which Plaintiff has very little memory of what happened.

23 18. Plaintiff is informed and believes that other patrons that evening were
24 offered and encouraged to take cocaine by Defendants' staff.

25 19. One witness reports being offered cocaine multiple times by multiple
26 dancers.

27

- 1 20. Another witness reported dancers at CH3 doing drugs in front of him that
2 evening. One dancer asked this witness to "blow coke off [her] ass."
3 21. At approximately 6:00 a.m. on Saturday morning, Plaintiff woke up, alone,
4 still in the back room of CH3.
5 22. Plaintiff then went back to his hotel to sleep.
6 23. When Plaintiff woke up, he discovered about \$16,000 charged to his credit
7 card, which he did not remember authorizing.
8 24. Over the next several days, Plaintiff noticed this number growing on his
9 online account, finally totaling approximately \$25,708.25, on two separate
10 cards.
11 25. In this way, Defendants exploited, and robbed, Plaintiff by "roofing" him
12 with alcohol and drugs and then running his credit cards for outrageous
13 amounts.
14 26. Upon information and belief, Defendants believed that Plaintiff would not
15 be able to dispute their illegal actions because of nature of these
16 allegations, that includes alcohol, illicit drugs and adult entertainment.
17 27. In this way, Defendants attempted to, and did, drug, exploit, and defraud
18 Plaintiff of tens of thousands of dollars.
19 28. As stated by Plaintiff in the police report: "This is fraudulent, this is theft,
20 this is wrong, and I want to file this report so it doesn't happen to the next
21 unsuspecting tourist."
22 29. Defendants are in the night life/adult entertainment industry and acted
23 willfully and recklessly in its scheme to defraud Plaintiff.
24 30. As a result of Defendants' actions and failures to act, Plaintiff has suffered
25 actual and consequential damages, and is entitled to recover actual,
26 consequential, statutory and punitive damages, each in an amount to be
27 determined at trial, as well as attorney's fees and costs.

First Cause of Action

Deceptive Trade Practices NRS 598

31. Plaintiff repeats, re-alleges, and incorporates by reference all previous paragraphs.

32. Defendant violated numerous provisions of NRS 598. Thus, Plaintiff is entitled to remedies under NRS 41.600 and NRS 598.

Violations of NRS 598.0915

33. NRS 598.0915 states: A person engages in a 'deceptive trade practice,' if in the course of his or her business occupation, he or she:

(5) Knowingly makes a false representation as to the characteristics, ingredients, uses, benefits, alterations or quantities of goods or services for sale or lease or a false representation as to the sponsorship, approval, status, affiliation or connection of a person therewith.

...

(7) Represents that goods or services for sale or lease are of a particular standard, quality or grade, or that such goods are of a particular style or model, if he or she knows or should know that they are of another standard, quality, grade, style or model.

...

(9) Advertises goods or services with intent not to sell or lease them as advertised.

...

(11) Advertises goods or services as being available free of charge with intent to require payment of undisclosed costs as a condition of receiving the goods or services.

...

(14) Fraudulently alters any contract, written estimate of repair, written statement of charges or other document in connection with the sale or lease of goods or services.

(15) Knowingly makes any other false representation in a transaction.

34. Defendants violated each of the above provisions of NRS 598 when they fraudulently and repeatedly charged Plaintiff's credit card while Plaintiff

1 had no ability to consent to such charges, as discussed herein, in violation
2 of NRS 598.0915.

3 **Violations of NRS 598.092**

4 35. NRS 598.092(8) prohibits knowingly misrepresenting the legal rights,
5 obligations or remedies of a party to a transaction.

6 36. Defendants violated NRS 598.092 when they fraudulently and repeatedly
7 charged Plaintiff's credit card while Plaintiff had no ability to consent to
8 such charges, as discussed herein, in violation of NRS 598.092.

9 **Violations of NRS 598.0923**

10 37. NRS 598.0923 states that a person engages in a "deceptive trade practice"
11 when in the course of his or her business or occupation he or she knowingly
12 "Fails to disclose a material fact in connection with the sale or lease of
13 goods or services."

14 38. Defendants violated NRS 598.0923 when they fraudulently and repeatedly
15 charged Plaintiff's credit card while Plaintiff had no ability to consent to
16 such charges, as discussed herein, in violation of NRS 598.0923.

17 **Remedies Under NRS 41.600(3) for Violations of NRS 598**

18 39. NRS 41.600(1) states that an action may be brought by any person who is
19 a victim of consumer fraud.

20 40. NRS 41.600(2) defines "consumer fraud" as a "deceptive trade practice"
21 as defined in NRS 598.0915 to NRS 598.0925.

22 41. Plaintiff is entitled to recover his actual and consequential damages
23 pursuant to NRS 41.600(3)(a) in an amount to be determined at trial.

24 42. Plaintiff is entitled to recover his reasonable attorneys' fees and costs
25 pursuant to NRS 41.600(3)(c).

1 43. Defendants' conduct was oppressive, malicious, and fraudulent, such that
2 an award of punitive damages is justified in order to punish Defendants
3 and deter others from like conduct.

4 **Second Cause of Action**

5 **Conversion**

6 44. Plaintiff repeats, re-alleges, and incorporates by reference all previous
7 paragraphs.

8 45. In Nevada, an action for conversion will lie where there is a distinct act of
9 dominion wrongfully exerted over another's personal property in denial of,
10 or inconsistent with her title or rights therein or in derogation, exclusion,
11 or defiance of such title or rights. *M.C. Multi-Family Development, L.L.C*
12 *v. Cretdale Associates, Ltd.*, 124 Nev. Adv. Rep. 77, 193 P.3d 536, 542
13 (2008) (citing *Evans v. Dean Witter Reynolds, Inc.*, 116 Nev. 598, 606, 5
14 P.3d 1043, 1048 (2000)). Conversion is an act of general intent, and is not
15 excused by care, good faith, or lack of knowledge. *Id.* Personal property
16 need not be tangible in order to give rise to a conversion claim. *Id.* at 77,
17 538.

18 46. Defendants took thousands of dollars from Plaintiff at a time when Plaintiff
19 was not conscious and/or not able to give consent to the charges made by
20 Defendants.

21 47. Accordingly, Defendants committed the tort of conversion of personal
22 property by wrongfully exerting dominion and control over Plaintiff's
23 property in denial of his rights therein.

24 48. Plaintiff is entitled to actual damages in an amount to be proven at trial.

25 49. Plaintiff is entitled to punitive damages in an amount to be proven at trial.

26 50. Plaintiff is entitled to attorney's fees pursuant to NRS 18.010 in the event
27 Plaintiff recovers less than \$20,000.00.

Third Cause of Action**Federal Civil RICO, 18 U.S.C. § 1962(c)**

51. Plaintiff repeats, re-alleges, and incorporates by reference all previous paragraphs.
52. Defendant violated RICO and Plaintiff was injured as a result.
53. Each Defendant is a "person" capable of holding legal or beneficial interest in property within the meaning of 18 U.S.C. § 1961(3).
54. Each Defendant violated 18 U.S.C. § 1962(c) by the acts described herein.
55. Defendants form an association in fact for the common and continuing purpose described herein and constitute an enterprise within the meaning of 18 U.S.C. § 1962(4), engaged in the conduct of their affairs through a pattern of racketeering activity.
56. The enterprise is engaged in interstate commerce.
57. Defendants, each of whom are persons associated with, or employed by, the enterprise, did knowingly, willfully and unlawfully conduct or participate directly or indirectly, in the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1962(1), 1962(5), and 1962(c). The racketeering activity was made possible by Defendants' regular and repeated use of the facilities and services of the enterprise.
58. Defendants had the specific intent to engage in the substantive RICO violation alleged herein.
59. Predicate acts of racketeering activity are acts which are indictable under provisions of the U.S. Code enumerated in 18 U.S.C. § 1961(1)(B). Defendants each committed at least two such acts or else aided and abetted such acts.

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Las Vegas, Nevada 89123

- 1 60. The acts of racketeering were not isolated, but rather the acts of Defendants
2 were related in that they had the same or similar purpose and result,
3 participants, victims and method of commission. Further, the acts of
4 racketeering by Defendants was continuous. There was repeated conduct
5 throughout Plaintiff's stay in the establishment.
- 6 61. Among other things, Defendants committed acts constituting indictable
7 offenses under 18 U.S.C. §§ 1341 and 1343 in that they devised or intended
8 to devise a scheme or artifice to defraud Plaintiff or to obtain money from
9 Plaintiff by means of false or fraudulent pretenses, representations or
10 promises. For the purpose of executing their scheme or artifice, Defendants
11 transmitted or caused to be transmitted by means of wire communications
12 in interstate or foreign commerce various writings, signs and signals. The
13 acts of Defendants set forth herein were done with knowledge that the use
14 of the mails or wires would follow in the ordinary course of business or
15 that such use could have been foreseen, even if not actually intended.
16 These acts were done intentionally and knowingly with the specific intent
17 to advance Defendants' scheme or artifice.
- 18 62. Defendants have conducted or participated in the conduct of the affairs of
19 the alleged enterprises through a pattern of racketeering activity as defined
20 herein in violation of 18 U.S.C. §§ 1962(c).
- 21 63. The unlawful actions of Defendants, and each of them, have directly,
22 illegally, and proximately caused and continue to cause injuries to
23 Plaintiff. Plaintiff seeks an award of damages in compensation for, among
24 other things, the thousands of dollars Defendants stole from Plaintiff.
- 25 64. Plaintiff accordingly seeks an award of three times the damages he
26 sustained, and the recovery of reasonable attorneys' fees and costs of
27

1 investigation and litigation, as well as any other relief as authorized by
2 statute.

3 **Fourth Cause of Action**

4 **Conspiracy to violate Federal Civil RICO, 18 U.S.C. § 1962(d)**

5 65. Plaintiff repeats, re-alleges, and incorporates by reference all previous
6 paragraphs.

7 66. In violation of 18 U.S.C. § 1962(d), Defendants, and each of them,
8 knowingly, willfully, and unlawfully conspired to facilitate a scheme
9 which included the operation or management of a RICO enterprise through
10 a pattern of racketeering activity as alleged above.

11 67. The conspiracy's purpose was to divert money from Plaintiff to their own
12 benefit.

13 68. Each Defendant committed at least one overt act in furtherance of such
14 conspiracy.

15 69. Even if some of the defendants did not agree to harm Plaintiff specifically,
16 the purpose of the acts they engaged in was to advance the overall object
17 of the conspiracy, and the harm to Plaintiff was a reasonably foreseeable
18 consequence of Defendants' actions.

19 70. Plaintiff has been injured and continues to be injured by Defendants'
20 conspiracy in violation of 18 U.S.C. § 1962(d). The unlawful actions of
21 Defendants, and each of them, have directly, illegally, and proximately
22 caused and continue to cause injuries to Plaintiff. Plaintiff seeks an award
23 of damages in compensation for, among other things, the thousands of
24 dollars that Defendants stole from Plaintiff. Plaintiff further seeks an award
25 of three times the damages he sustained, and the recovery of reasonable
26 attorneys' fees and costs of investigation and litigation, as well as any other
27 relief, as authorized.

Fifth Cause of Action

Fraud

71. Plaintiff repeats, re-alleges, and incorporates by reference all previous paragraphs.
72. Defendants, upon information and belief, knowingly and intentionally incapacitated Plaintiff and charged his credit card while Plaintiff was not in a position to authorize such charges.
73. Defendants' fraudulent acts include those set forth above.
74. Plaintiff justifiably relied on Defendant's representations and concealment of their intentions. Plaintiff did so in the justifiable belief that he was receiving honest services from Defendants.
75. Defendants conduct was willful, wanton, malicious, and oppressive.
76. Defendants' unlawful conduct has directly, legally, and proximately caused and continues to cause injuries to Plaintiff. Accordingly, Plaintiff seeks an award of damages in compensation for, among other things, the thousands of dollars that Defendants stole from Plaintiff. Further, Plaintiff seeks the imposition of punitive damages sufficient to deter Defendants from committing such unlawful conduct in the future.

Sixth Cause of Action

Nevada Civil RICO, NRS 207.400

(Including conspiracy to violate Nevada Civil RICO)

77. Plaintiff repeats, re-alleges, and incorporates by reference all previous paragraphs.
78. Defendants violated Nevada RICO and Plaintiff was injured as a result.
79. As detailed herein, Defendants engaged in a pattern of racketeering activity, in violation of NRS 207.400(1)(a)-(j).
80. Each Defendant violated NRS 207.400 by the acts described herein.

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Las Vegas, Nevada 89123

- 1 81. Defendants form an association in fact for the common and continuing
2 purpose described herein and constitute an enterprise, engaged in the
3 conduct of their affairs through a pattern of racketeering activity.
- 4 82. The enterprises engaged in interstate commerce.
- 5 83. Defendants, each of whom are persons associated with, or employed by,
6 the enterprise, did knowingly, willfully and unlawfully conduct or
7 participate directly or indirectly, in the affairs of the enterprise through a
8 pattern of racketeering activity within the meaning of NRS 207.400. The
9 racketeering activity was made possible by Defendants' regular and
10 repeated use of the facilities and services of the enterprise.
- 11 84. Defendants had the specific intent to engage in the substantive RICO
12 violation alleged herein.
- 13 85. The acts of racketeering were not isolated, but rather the acts of Defendants
14 were related in that they had the same or similar purpose and result,
15 participants, victims and method of commission. Further, the acts of
16 racketeering by Defendants was continuous. There was repeated conduct
17 throughout Plaintiff's stay in the establishment.
- 18 86. Defendants have conducted or participated in the conduct of the affairs of
19 the alleged enterprises through a pattern of racketeering activity as detailed
20 herein and in violation of NRS 207.400.
- 21 87. The unlawful actions of Defendants, and each of them, have directly,
22 illegally, and proximately caused and continue to cause injuries to
23 Plaintiff.
- 24 88. Plaintiff accordingly seeks an award of three times the damages he
25 sustained, and the recovery of reasonable attorneys' fees and costs of
26 investigation and litigation, as well as any other relief as authorized under
27 NRS 207.470.

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Prayer for relief

89. Plaintiff respectfully requests that this Court grant Plaintiff the following relief:

- Actual damages in excess of \$15,000 in an amount to be determined at trial;
- Consequential damages in an amount to be determined at trial;
- Punitive damages in an amount to be determined at trial;
- Attorneys' fees and costs; and
- Any other relief the Court may deem just and proper.

TRIAL BY JURY

90. Pursuant to the seventh amendment to the Constitution of the United States of America and the Constitution of the State of Nevada, Plaintiff is entitled to, and demands, a trial by jury.

Dated: December 17, 2019.

Respectfully submitted,

KIND LAW

/s/ Michael Kind

Michael Kind, Esq.

8860 South Maryland Parkway, Suite 106

Las Vegas, Nevada 89123

Attorney for Plaintiff John Doe (NY)

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21 **DAYS. READ THE INFORMATION BELOW CAREFULLY.**

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14 If you intend to seek an attorney's advice, do it quickly so that your
15 response can be filed on time.

16 STEVEN D. GRIERSON, CLERK OF COURT

17 *Marie Kramer* 12/10/2019
18 By: Marie Kramer Date
19 Deputy Clerk
20 Regional Justice Center
21 200 Lewis Avenue
22 Las Vegas, Nevada 89155

23 Issued at the request of:

24 *Michael Kind*
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DISTRICT COURT CIVIL COVER SHEET

CASE NO: A-19-807137-C

Clark

County, Nevada

Department 28

Case No.

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)	
Plaintiff(s) (name/address/phone):	Defendant(s) (name/address/phone):
John Doe (NY)	Russell Road Food And Beverage, LLC dba Crazy Horse 3 Gentlemen's Club, et al
Attorney (name/address/phone):	Attorney (name/address/phone):
Michael Kind 8860 S. Maryland Parkway, Suite 106 Las Vegas, Nevada 89123 702 337-2322 – MK@KINDLAW.COM	

II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing <input type="checkbox"/> Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input checked="" type="checkbox"/> Other Civil Matters

Backdoor Court Filings should be filed using the Backdoor Court Civil Cover Sheet

December 17, 2019

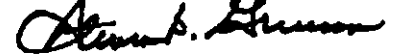
Date

Michael Kind

Signature of initiating party or representative

See other side for family-related case filings.

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Steven D. Grierson
CLERK OF THE COURT



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9 Attorney for Plaintiff John Doe (NY)

CASE NO: A-19-807137-C
Department 28

**EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

11 John Doe (NY),

12 Plaintiff,

13 v.

14
15 Russell Road Food and Beverage,
16 LLC *dba* Crazy Horse 3
17 Gentlemen's Club, Doc 2 through
18 100, and Roe Corporation 1
19 through 100,

20 Defendants.

Case No.:
Dept. No.:

Complaint for damages

EXEMPT from Arbitration:
Excess of \$50,000

Jury Trial Demanded

Introduction

- 21
22
23 1. This Complaint arises out of unlawful and deceptive actions committed by
24 Russell Road Food and Beverage, LLC *doing business as* Crazy Horse 3
25 Gentlemen's Club ("CH3"), Doc 2 through 100 and Roe Corporation 1
26 through 100 (collectively referred to herein as "Defendants"), causing
27 harm to John Doe (NY) ("Plaintiff"), in connection with a scheme in which

COMPLAINT

— 1 —

- 1 Defendants drugged Plaintiff and then drained his credit card account,
2 while Plaintiff was in and out of consciousness.
- 3 2. Defendants violated multiple provisions of NRS 598, Federal and Nevada
4 RICO, and committed conversion and fraud against Plaintiff.
- 5 3. Plaintiff seeks actual damages, statutory damages, consequential damages,
6 punitive damages in an amount sufficient to punish Defendants and to deter
7 others from like conduct, and attorneys' fees and costs.

8 **Jurisdiction**

- 9 4. This Court has jurisdiction to hear this case.
- 10 5. Defendants are people and corporations doing business in Clark County,
11 Nevada.
- 12 6. The parties' relationship arose out of Plaintiff's visit to Defendants' club
13 in Las Vegas.
- 14 7. Therefore, the Eighth Judicial District Court, Clark County, Nevada has
15 personal jurisdiction over both Plaintiff and Defendant and subject matter
16 jurisdiction pursuant to Article 6, Section 6 of the Nevada Constitution and
17 NRS 4.370.

18 **Parties**

- 19 8. Plaintiff is an individual and a resident of New York State.
- 20 9. CH3 provides adult entertainment in Las Vegas, primarily targeted toward
21 and visited by tourists and out-of-town visitors.
- 22 10. The true names and capacities, whether individual, plural, corporate,
23 partnership, associate, or otherwise, of defendants Doe 2 through 100 and
24 Roe Corporation 1 through 100 inclusive are unknown to Plaintiff at this
25 time, who therefore sues these defendants by such fictitious names. The
26 full extent of the facts linking such fictitiously sued defendants is unknown
27 to Plaintiff.

1 11. Plaintiff is informed and believes and therefore alleges that each of the
2 defendants designated herein as a Doe or Roe was and is responsible for
3 the events described herein. Plaintiff intends to seek leave of the Court to
4 amend this Complaint to show the true names of these fictitiously named
5 defendants after some initial discovery.

6 12. The legal responsibility of these Doe and Roe defendants arises out of, but
7 is not limited to, their status as employees, agents, managers, officers of
8 Defendant, and/or other related people or entities.

9 13. All of the acts and/or failures to act alleged herein were duly performed by
10 and/or are attributable to Defendants, acting by and through their agents
11 and employees. Said acts and failures to act were within the scope of said
12 agency and/or employment, and Defendants ratified said acts and
13 omissions.

14 **Factual allegations**

15 14. On the evening of October 11-12, 2019 (Friday night), Plaintiff visited
16 CH3, while visiting Las Vegas with a group of his friends.

17 15. At approximately 11:30 p.m., Plaintiff was invited to a back room for a
18 dance.

19 16. Plaintiff was immediately barraged by two women who began to bring
20 Plaintiff one drink after another, and encouraging him to drink.

21 17. As some point, the women gave Plaintiff and unidentified drug substance,
22 after which Plaintiff has very little memory of what happened.

23 18. Plaintiff is informed and believes that other patrons that evening were
24 offered and encouraged to take cocaine by Defendants' staff.

25 19. One witness reports being offered cocaine multiple times by multiple
26 dancers.
27

- 1 20. Another witness reported dancers at CH3 doing drugs in front of him that
2 evening. One dancer asked this witness to "blow coke off [her] ass."
3 21. At approximately 6:00 a.m. on Saturday morning, Plaintiff woke up, alone,
4 still in the back room of CH3.
5 22. Plaintiff then went back to his hotel to sleep.
6 23. When Plaintiff woke up, he discovered about \$16,000 charged to his credit
7 card, which he did not remember authorizing.
8 24. Over the next several days, Plaintiff noticed this number growing on his
9 online account, finally totaling approximately \$25,708.25, on two separate
10 cards.
11 25. In this way, Defendants exploited, and robbed, Plaintiff by "roofing" him
12 with alcohol and drugs and then running his credit cards for outrageous
13 amounts.
14 26. Upon information and belief, Defendants believed that Plaintiff would not
15 be able to dispute their illegal actions because of nature of these
16 allegations, that includes alcohol, illicit drugs and adult entertainment.
17 27. In this way, Defendants attempted to, and did, drug, exploit, and defraud
18 Plaintiff of tens of thousands of dollars.
19 28. As stated by Plaintiff in the police report: "This is fraudulent, this is theft,
20 this is wrong, and I want to file this report so it doesn't happen to the next
21 unsuspecting tourist."
22 29. Defendants are in the night life/adult entertainment industry and acted
23 willfully and recklessly in its scheme to defraud Plaintiff.
24 30. As a result of Defendants' actions and failures to act, Plaintiff has suffered
25 actual and consequential damages, and is entitled to recover actual,
26 consequential, statutory and punitive damages, each in an amount to be
27 determined at trial, as well as attorney's fees and costs.

First Cause of Action

Deceptive Trade Practices NRS 598

31. Plaintiff repeats, re-alleges, and incorporates by reference all previous paragraphs.

32. Defendant violated numerous provisions of NRS 598. Thus, Plaintiff is entitled to remedies under NRS 41.600 and NRS 598.

Violations of NRS 598.0915

33. NRS 598.0915 states: A person engages in a 'deceptive trade practice,' if in the course of his or her business occupation, he or she:

(5) Knowingly makes a false representation as to the characteristics, ingredients, uses, benefits, alterations or quantities of goods or services for sale or lease or a false representation as to the sponsorship, approval, status, affiliation or connection of a person therewith.

...

(7) Represents that goods or services for sale or lease are of a particular standard, quality or grade, or that such goods are of a particular style or model, if he or she knows or should know that they are of another standard, quality, grade, style or model.

...

(9) Advertises goods or services with intent not to sell or lease them as advertised.

...

(11) Advertises goods or services as being available free of charge with intent to require payment of undisclosed costs as a condition of receiving the goods or services.

...

(14) Fraudulently alters any contract, written estimate of repair, written statement of charges or other document in connection with the sale or lease of goods or services.

(15) Knowingly makes any other false representation in a transaction.

34. Defendants violated each of the above provisions of NRS 598 when they fraudulently and repeatedly charged Plaintiff's credit card while Plaintiff

1 had no ability to consent to such charges, as discussed herein, in violation
2 of NRS 598.0915.

3 **Violations of NRS 598.092**

4 35. NRS 598.092(8) prohibits knowingly misrepresenting the legal rights,
5 obligations or remedies of a party to a transaction.

6 36. Defendants violated NRS 598.092 when they fraudulently and repeatedly
7 charged Plaintiff's credit card while Plaintiff had no ability to consent to
8 such charges, as discussed herein, in violation of NRS 598.092.

9 **Violations of NRS 598.0923**

10 37. NRS 598.0923 states that a person engages in a "deceptive trade practice"
11 when in the course of his or her business or occupation he or she knowingly
12 "Fails to disclose a material fact in connection with the sale or lease of
13 goods or services."

14 38. Defendants violated NRS 598.0923 when they fraudulently and repeatedly
15 charged Plaintiff's credit card while Plaintiff had no ability to consent to
16 such charges, as discussed herein, in violation of NRS 598.0923.

17 **Remedies Under NRS 41.600(3) for Violations of NRS 598**

18 39. NRS 41.600(1) states that an action may be brought by any person who is
19 a victim of consumer fraud.

20 40. NRS 41.600(2) defines "consumer fraud" as a "deceptive trade practice"
21 as defined in NRS 598.0915 to NRS 598.0925.

22 41. Plaintiff is entitled to recover his actual and consequential damages
23 pursuant to NRS 41.600(3)(a) in an amount to be determined at trial.

24 42. Plaintiff is entitled to recover his reasonable attorneys' fees and costs
25 pursuant to NRS 41.600(3)(c).
26
27

1 43. Defendants' conduct was oppressive, malicious, and fraudulent, such that
 2 an award of punitive damages is justified in order to punish Defendants
 3 and deter others from like conduct.

4 Second Cause of Action

5 Conversion

6 44. Plaintiff repeats, re-alleges, and incorporates by reference all previous
 7 paragraphs.

8 45. In Nevada, an action for conversion will lie where there is a distinct act of
 9 dominion wrongfully exerted over another's personal property in denial of,
 10 or inconsistent with her title or rights therein or in derogation, exclusion,
 11 or defiance of such title or rights. *M.C. Multi-Family Development, L.L.C*
 12 *v. Cretdale Associates, Ltd.*, 124 Nev. Adv. Rep. 77, 193 P.3d 536, 542
 13 (2008) (citing *Evans v. Dean Witter Reynolds, Inc.*, 116 Nev. 598, 606, 5
 14 P.3d 1043, 1048 (2000)). Conversion is an act of general intent, and is not
 15 excused by care, good faith, or lack of knowledge. *Id.* Personal property
 16 need not be tangible in order to give rise to a conversion claim. *Id.* at 77,
 17 538.

18 46. Defendants took thousands of dollars from Plaintiff at a time when Plaintiff
 19 was not conscious and/or not able to give consent to the charges made by
 20 Defendants.

21 47. Accordingly, Defendants committed the tort of conversion of personal
 22 property by wrongfully exerting dominion and control over Plaintiff's
 23 property in denial of his rights therein.

24 48. Plaintiff is entitled to actual damages in an amount to be proven at trial.

25 49. Plaintiff is entitled to punitive damages in an amount to be proven at trial.

26 50. Plaintiff is entitled to attorney's fees pursuant to NRS 18.010 in the event
 27 Plaintiff recovers less than \$20,000.00.

Third Cause of Action

Federal Civil RICO, 18 U.S.C. § 1962(c)

51. Plaintiff repeats, re-alleges, and incorporates by reference all previous paragraphs.
52. Defendant violated RICO and Plaintiff was injured as a result.
53. Each Defendant is a "person" capable of holding legal or beneficial interest in property within the meaning of 18 U.S.C. § 1961(3).
54. Each Defendant violated 18 U.S.C. § 1962(c) by the acts described herein.
55. Defendants form an association in fact for the common and continuing purpose described herein and constitute an enterprise within the meaning of 18 U.S.C. § 1962(4), engaged in the conduct of their affairs through a pattern of racketeering activity.
56. The enterprise is engaged in interstate commerce.
57. Defendants, each of whom are persons associated with, or employed by, the enterprise, did knowingly, willfully and unlawfully conduct or participate directly or indirectly, in the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1962(1), 1962(5), and 1962(c). The racketeering activity was made possible by Defendants' regular and repeated use of the facilities and services of the enterprise.
58. Defendants had the specific intent to engage in the substantive RICO violation alleged herein.
59. Predicate acts of racketeering activity are acts which are indictable under provisions of the U.S. Code enumerated in 18 U.S.C. § 1961(1)(B). Defendants each committed at least two such acts or else aided and abetted such acts.

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- 1 60. The acts of racketeering were not isolated, but rather the acts of Defendants
2 were related in that they had the same or similar purpose and result,
3 participants, victims and method of commission. Further, the acts of
4 racketeering by Defendants was continuous. There was repeated conduct
5 throughout Plaintiff's stay in the establishment.
- 6 61. Among other things, Defendants committed acts constituting indictable
7 offenses under 18 U.S.C. §§ 1341 and 1343 in that they devised or intended
8 to devise a scheme or artifice to defraud Plaintiff or to obtain money from
9 Plaintiff by means of false or fraudulent pretenses, representations or
10 promises. For the purpose of executing their scheme or artifice, Defendants
11 transmitted or caused to be transmitted by means of wire communications
12 in interstate or foreign commerce various writings, signs and signals. The
13 acts of Defendants set forth herein were done with knowledge that the use
14 of the mails or wires would follow in the ordinary course of business or
15 that such use could have been foreseen, even if not actually intended.
16 These acts were done intentionally and knowingly with the specific intent
17 to advance Defendants' scheme or artifice.
- 18 62. Defendants have conducted or participated in the conduct of the affairs of
19 the alleged enterprises through a pattern of racketeering activity as defined
20 herein in violation of 18 U.S.C. §§ 1962(c).
- 21 63. The unlawful actions of Defendants, and each of them, have directly,
22 illegally, and proximately caused and continue to cause injuries to
23 Plaintiff. Plaintiff seeks an award of damages in compensation for, among
24 other things, the thousands of dollars Defendants stole from Plaintiff.
- 25 64. Plaintiff accordingly seeks an award of three times the damages he
26 sustained, and the recovery of reasonable attorneys' fees and costs of
27

1 investigation and litigation, as well as any other relief as authorized by
2 statute.

3 **Fourth Cause of Action**

4 **Conspiracy to violate Federal Civil RICO, 18 U.S.C. § 1962(d)**

5 65. Plaintiff repeats, re-alleges, and incorporates by reference all previous
6 paragraphs.

7 66. In violation of 18 U.S.C. § 1962(d), Defendants, and each of them,
8 knowingly, willfully, and unlawfully conspired to facilitate a scheme
9 which included the operation or management of a RICO enterprise through
10 a pattern of racketeering activity as alleged above.

11 67. The conspiracy's purpose was to divert money from Plaintiff to their own
12 benefit.

13 68. Each Defendant committed at least one overt act in furtherance of such
14 conspiracy.

15 69. Even if some of the defendants did not agree to harm Plaintiff specifically,
16 the purpose of the acts they engaged in was to advance the overall object
17 of the conspiracy, and the harm to Plaintiff was a reasonably foreseeable
18 consequence of Defendants' actions.

19 70. Plaintiff has been injured and continues to be injured by Defendants'
20 conspiracy in violation of 18 U.S.C. § 1962(d). The unlawful actions of
21 Defendants, and each of them, have directly, illegally, and proximately
22 caused and continue to cause injuries to Plaintiff. Plaintiff seeks an award
23 of damages in compensation for, among other things, the thousands of
24 dollars that Defendants stole from Plaintiff. Plaintiff further seeks an award
25 of three times the damages he sustained, and the recovery of reasonable
26 attorneys' fees and costs of investigation and litigation, as well as any other
27 relief, as authorized.

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Fifth Cause of Action

Fraud

71. Plaintiff repeats, re-alleges, and incorporates by reference all previous paragraphs.
72. Defendants, upon information and belief, knowingly and intentionally incapacitated Plaintiff and charged his credit card while Plaintiff was not in a position to authorize such charges.
73. Defendants' fraudulent acts include those set forth above.
74. Plaintiff justifiably relied on Defendant's representations and concealment of their intentions. Plaintiff did so in the justifiable belief that he was receiving honest services from Defendants.
75. Defendants conduct was willful, wanton, malicious, and oppressive.
76. Defendants' unlawful conduct has directly, legally, and proximately caused and continues to cause injuries to Plaintiff. Accordingly, Plaintiff seeks an award of damages in compensation for, among other things, the thousands of dollars that Defendants stole from Plaintiff. Further, Plaintiff seeks the imposition of punitive damages sufficient to deter Defendants from committing such unlawful conduct in the future.

Sixth Cause of Action

Nevada Civil RICO, NRS 207.400

(Including conspiracy to violate Nevada Civil RICO)

77. Plaintiff repeats, re-alleges, and incorporates by reference all previous paragraphs.
78. Defendants violated Nevada RICO and Plaintiff was injured as a result.
79. As detailed herein, Defendants engaged in a pattern of racketeering activity, in violation of NRS 207.400(1)(a)-(j).
80. Each Defendant violated NRS 207.400 by the acts described herein.

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- 1 81. Defendants form an association in fact for the common and continuing
2 purpose described herein and constitute an enterprise, engaged in the
3 conduct of their affairs through a pattern of racketeering activity.
- 4 82. The enterprises engaged in interstate commerce.
- 5 83. Defendants, each of whom are persons associated with, or employed by,
6 the enterprise, did knowingly, willfully and unlawfully conduct or
7 participate directly or indirectly, in the affairs of the enterprise through a
8 pattern of racketeering activity within the meaning of NRS 207.400. The
9 racketeering activity was made possible by Defendants' regular and
10 repeated use of the facilities and services of the enterprise.
- 11 84. Defendants had the specific intent to engage in the substantive RICO
12 violation alleged herein.
- 13 85. The acts of racketeering were not isolated, but rather the acts of Defendants
14 were related in that they had the same or similar purpose and result,
15 participants, victims and method of commission. Further, the acts of
16 racketeering by Defendants was continuous. There was repeated conduct
17 throughout Plaintiff's stay in the establishment.
- 18 86. Defendants have conducted or participated in the conduct of the affairs of
19 the alleged enterprises through a pattern of racketeering activity as detailed
20 herein and in violation of NRS 207.400.
- 21 87. The unlawful actions of Defendants, and each of them, have directly,
22 illegally, and proximately caused and continue to cause injuries to
23 Plaintiff.
- 24 88. Plaintiff accordingly seeks an award of three times the damages he
25 sustained, and the recovery of reasonable attorneys' fees and costs of
26 investigation and litigation, as well as any other relief as authorized under
27 NRS 207.470.

Prayer for relief

89. Plaintiff respectfully requests that this Court grant Plaintiff the following relief:

- Actual damages in excess of \$15,000 in an amount to be determined at trial;
- Consequential damages in an amount to be determined at trial;
- Punitive damages in an amount to be determined at trial;
- Attorneys' fees and costs; and
- Any other relief the Court may deem just and proper.

TRIAL BY JURY

90. Pursuant to the seventh amendment to the Constitution of the United States of America and the Constitution of the State of Nevada, Plaintiff is entitled to, and demands, a trial by jury.

Dated: December 17, 2019.

Respectfully submitted,

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/s/ Michael Kind

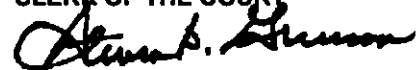
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CASE NO: A-19-807137-C
Department 28

**EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

John Doe (NY),

Plaintiff,

v.

Russell Road Food And Beverage,
LLC dba Crazy Horse 3 Gentlemen's
Club, et al,

Defendant.

Case No.:

Dept. No.:

Initial Appearance Fee Disclosure

INITIAL APPEARANCE FEE DISCLOSURE (NRS 19)

Pursuant to NRS 19, as amended by Senate Bill 106, filing fees are submitted for parties appearing in the above entitled action as indicated below:

First appearance fee: \$270

Total Paid: \$270.

Dated: December 17, 2019.

KIND LAW

/s/ Michael Kind

Michael Kind, Esq.

8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123

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NOTA
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Phone: (702) 880-5554
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Attorneys for Plaintiff
JOHN DOE (NY)

**NEVADA STATE COURT
CLARK COUNTY NEVADA**

<p>JOHN DOE (NY),</p> <p>Plaintiff,</p> <p>v.</p> <p>RUSSELL ROAD FOOD AND BEVERAGE D/B/A CRAZY HORSE 3 GENTLEMAN'S CLUB, DOE 2-100 AND ROE CORP. 1-100,</p> <p>Defendants.</p>	<p>Case No. A-19-807137-C Department 28</p> <p>NOTICE OF APPEARANCE</p>
---	--

Please take notice that the Law Firm of Haines & Krieger, LLC (the "Firm"), through its attorney, David H. Krieger, Esq., hereby appears for JOHN DOE (NY), the Plaintiff in the above matter.

DATED December 18, 2019

HAINES & KRIEGER, LLC

By: David H. Krieger, Esq.
David H. Krieger, Esq.
Attorneys for Defendant
JOHN DOE (NY)